

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re:	:	CHAPTER 13
Khallil D. Shaheed, Jr.	:	BANKRUPTCY NO.: 19-11425-amc
Khallil D. Shaheed	:	
Debtor	:	

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**STIPULATION OF SETTLEMENT OF  
MOTION OF CATRINA BOWSER FOR RELIEF FROM AUTOMATIC STAY**

This stipulation is entered into by and between the Debtor, Khallil D. Shaheed, Jr., by and through his counsel, Erik B. Jensen, and Catrina Bowser, by and through her counsel, Matthew L. Solomon;

WHEREAS, Khallil D. Shaheed, Jr. (Debtor) filed a petition under Chapter 13 of the Bankruptcy Code on March 7, 2019; and

WHEREAS, on September 7, 2018, Catrina Bowser (Movant) filed a civil action against Debtor alleging injuries stemming from a motor vehicle accident; and

WHEREAS, Debtor is insured by Progressive Insurance Company; and

WHEREAS, On May 13, 2019, Movant filed a Motion seeking for relief from the automatic stay;

NOW, THEREFORE, it is hereby stipulated and agreed by and between Debtor and Movant, as follows:

1. Debtor agrees to grant Movant limited relief from the automatic stay to pursue her claims against the Debtor and others in Movant's civil action filed in the Court of Common Pleas;
2. Any recovery due to Movant shall not exceed the liability limits of Debtor's Progressive Insurance Policy;
3. To the extent that a verdict in Movant's favor does indeed exceed Debtor's insurance policy limits, the excess shall be uncollectable by Movant and, furthermore, the amount shall be treated as a general unsecured debt and subject to discharge pursuant to Chapter 13 of the Bankruptcy Code;

4. In the event of judgment for the Movant, Movant shall not seek to satisfy its debt by seeking payment from the Trustee out of Debtor's funds or assets;

IN WITNESS WHEREOF, and intending to be legally bound hereby, the parties have entered into this Stipulation:

Date: 7/29/19

/s/ Matthew L Solomon Esquire

Matthew L. Solomon, Esquire  
Counsel for Catrina Bowser

Date: July 26, 2019

/s/ Erik B. Jensen, Esquire

Erik B. Jensen, Esquire  
Counsel for Debtor